Appendix 3.7 Roadless Area Issue Analysis Report

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Issue Statement: There are some unclassified roads known to occur within inventoried roadless areas. Forest Service policy requires such roads to eventually be either closed or added to the classified road system. The potential need for new road construction within inventoried roadless areas during our current Forest Plan period is low.

Findings

- There are unclassified roads in roadless areas that need to be inventoried and assessed for access needs during watershed scale analysis. Policy requires that those that are needed be added to the classified road system, and others be decommissioned or converted to other uses such as trails.
- There is low potential need for constructing new roads in roadless areas.
 Timber management is about the only activity that can afford to build roads, and only about 2% of roadless areas are allocated to timber management.
- The potential effects of any future proposals to construct new roads would be unique to the specific roadless area that would be affected. Therefore, such effects are best addressed at the watershed or project scale.

Guidelines

Identifying Opportunities and Setting Priorities

No recommendations at this scale.

Watershed and Project Scale Analysis

- Inventory unclassified roads within inventoried roadless areas and assess their impacts on roadless area characteristics. Also, include them in the assessment of needed vs. unneeded roads.
- Assess the potential need for new road construction in roadless areas
 (including addition of unclassified roads to the classified road system), and
 the effects such construction would have on roadless area characteristics.
 Timber harvest is the most likely activity for which new roads would be
 constructed, so the assessment should focus on the need to access forest
 stands that have been allocated to timber management under the Forest
 Plan.

Construction

No recommendations at this scale.

Reconstruction and Deferred Maintenance

No recommendations at this scale.

Operation and Maintenance

No recommendations at this scale.

Closure and Decommissioning

No recommendations at this scale.

Analysis

Our analysis of this issue is rather general, focusing on the most likely drivers and scope of potential new road construction. It is not feasible at the forest scale to address the site-specific effects of road management on roadless areas. The specific location and nature of potential effects can only be adequately assessed at the watershed/project scale of roads analysis.

We assessed the potential scope of effects of road management on inventoried roadless areas¹.

> "Inventoried Roadless areas are undeveloped areas typically exceeding 5,000 acres that met the minimum criteria for wilderness consideration under the Wilderness Act and that were inventories durning the Forest Service's Roadless Area Review and Evaluation (RARE II) process, or subsequent broad-scale assessment, or forest planning."

The Mendocino NF contains 12 RARE II areas. In addition to the RARE II areas. the Forest Plan established the Yuki Management Area, which connects three RARE II areas² into a larger, contiguous area. Although Yuki is currently roaded to varying degrees, the Forest Plan prohibits new road construction, and was included in the final 2001 Roadless Area rule as an inventoried roadless area. So, our analysis covered all RARE II areas and the Yuki Management Area.

Potential for New Construction

The primary potential for new road construction in roadless areas would be associated with timber harvest. This is because it is the only management activity on the Mendocino NF that can financially support road construction and maintenance costs.

About 2075 acres (15%) of Yuki Management Area is allocated to timber management, but no new road construction is permitted (Mendocino NF.

¹ As defined in the glossary of the FEIS for the Roadless Area Conservation Rule (USDA Forest Service. 2001). ² Black Butte (#05629), Thatcher (#05141), and Elk Creek (#05140).

1995a.)[LRMP P. IV-140]. So, there is no potential for road construction within that portion of our roadless areas during the current Forest Plan period.

The Forest Plan allocated 38,850 acres (19%) of RARE II areas to multiple-use management, under which road construction would be permissible following the appropriate site-specific analysis and decision-making processes. The remaining 81% was allocated to prescriptions that either prohibit or severely restrict road construction. Consequently, the potential for road construction in roadless areas occurs mainly within the 38,850 acres allocated to multiple-use management.

The potential for road construction within the multiple-use areas is further limited by the small amount of land allocated to timber production. Only about 4375 acres (2%) of RARE II areas were allocated to timber management under the Forest Plan. Even if such areas were fully developed for road access, the potential scale of effects would be limited by their small acreage relative to the overall RARE II acreage.

Existing Unclassified Roads

Another potential source of "new" road construction would be the addition of existing unclassified roads to the classified road system. Forest Service policy requires that unclassified roads be evaluated to determine if they are needed 212.5(b). This should be done at the watershed or project scale of roads analysis. If they are needed, they are to be added to the classified road system (such a decision would be considered to be new construction (36 CFR 212.1). If not needed, they are to be decommissioned or converted to trails (36 CFR 212.5(b)(2).

We know of some unclassified roads located in roadless areas, based upon employee knowledge and discrepancies between the classified road system and roads shown on USGS topographic maps. However, we do not have very good information regarding the condition, use levels or effects of these roads on roadless area characteristics. Such information is to be developed through inventory in support of watershed/project scale roads analysis [FSM 7712.14(2); 7712.14 – Exhibit 01].

We consider there to be low potential in roadless areas for significant conversion of unclassified roads to trails or classified roads. Conversion within roadless areas that are allocated to multiple-use would be permissible, but there low potential for funding of such conversions. Timber management is the only likely activity with the financial wherewithal to support conversion, but most unclassified roads have alignments that are unsuitable for that purpose.

The only significant potential funding source for conversion to OHV trails would be grants from the State of California's OHV program. The potential amount of such funding is expected to be limited, and the current priority for such expenditures is for projects within or adjacent to the existing OHV management areas.